

May 16, 2003
The Secretary
FCC
Washington DC 20002

Re: RM-10666

INFORMAL COMMENT
ON NATIONAL TRANSLATOR
ASSOCIATION'S PETITION FOR RULEMAKING
TO ESTABLISH A RURAL TRANSLATOR SERVICE

The Rocky Mountain Corporation for Public Broadcasting (RMCPB) respectfully submits informal comment on RM-10666, March 6, 2003.

We react to NTA's Petition for Rulemaking within the context of the special challenges of our unique region and the evolution of rural PTV service in it.

1. RMCPB is a membership organization of public broadcasting stations and entities in the Rocky Mountain states, independent of the Corporation for Public Broadcasting and receiving no federal funding. Its purpose is to enhance development and operation of public broadcasting in the Rocky Mountain States-and increasingly to ensure continuing service to our isolated rural communities and areas.

Since 1968 RMCPB has assisted Public Radio and Public TV stations in the Rocky Mountain states in securing FCC authorization, and PTFP funding assistance, for stations, translators and interconnection facilities to extend service to the unserved and maintain existing service in our vast and thinly populated region.

2. Citizens in remote, rural and isolated areas enjoy the free commercial and non-commercial broadcast services they deserve, and need, solely because the Commission wisely authorized translators to meet the geographic, topographic and demographic challenges of this region.

Translators were demonstrably the appropriate means of extending free broadcast service efficiently and cost-effectively.

They still are. But they have become the Mexican Spotted Owls of broadcasting. Their habitat has shrunk and shrunk again until finally, with the deletion of Channels 52-59, TV stations-commercial and public-are hard pressed to maintain existing analog service to our rural communities through an inevitably lengthy period of DTV conversion transition.

3. In our region there are virtually no frequencies available for new public PTV applications-either to extend public broadcasting service to unserved areas and communities or simply to continue existing service.

In sum, our states and our people in isolated communities and areas face an ongoing crisis in universal access to free broadcasting service in rural America.

4. NTA seeks to address a small but critical aspect of that crisis. Finding that for a small and truly isolated community, even when a channel is available, the process of application can be unduly cumbersome, it proposes a simplified procedure for a "Rural Translator Service" translator.

5. RMCPB endorses and supports that effort.

We concur with NTA that "implementation of this service will help to

ensure the delivery of broadcast services to rural areas".

And we agree that "the Commission's goals of transitioning broadcast television from analog to digital service, providing for availability and attendant benefits of high definition television, and providing for free over-the-air broadcast television, both commercial and non-commercial, can only be accomplished in rural areas by the use of translator stations."

6. .RMCPB believes the details of the proposal should not be a major focus in consideration of NTA's request. Although so carefully and thoroughly devised as to amply warrant full consideration in the Rulemaking sought, they may or may not address all concerns and issues inherent in the proposal. (We might, for example, request special provision for areas lacking any PTV broadcast service.)

Primary concern at this point should instead be the necessity for beginning to address the present and future crisis in access to free broadcast service in rural America and the potential benefits of establishing the Rural Translator Service proposed.

7. RMCPB therefore recommends and requests that the Commission grant the NTA Petition and proceed with the Rulemaking proposed.

Respectfully submitted,

ROCKY MOUNTAIN CORPORATION FOR PUBLIC BROADCASTING

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